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**BEFORE THE  
PHYSICAL THERAPY BOARD OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ANTHONY MICHAEL DELZOMPO  
318 Doris Avenue  
Aptos, California 95003

License No. PT 21739

Respondent.

Case No.

**ACCUSATION**

Complainant alleges:

**PARTIES**

1. Steven K. Hartzell (“complainant”) brings this Accusation solely in his official capacity as the Executive Officer of the Physical Therapy Board of California, Department of Consumer Affairs.

2. On August 23, 1996, the Physical Therapy Board issued License Number PT 21739 to respondent, Anthony Michael Delzompo, P.T. (“respondent” or “Mr. Delzompo”). The license was suspended on April 4, 2004 pursuant to Family Code section 17520 for failure to make child support payments. There is no history of prior disciplinary action against this license.

**JURISDICTION**

3. This Accusation is brought before the Physical Therapy Board of California (“board”), under the authority of the following sections of the Business and Professions Code (“Code”).

1                   4.       Section 2609 of the Code states:

2                   “The Board shall issue, suspend, and revoke licenses and approvals to practice  
3 physical therapy as provided in this chapter.”

4                   5.       Section 2660 of the Code provides, in pertinent part:

5                   “The Board may, after the conduct of appropriate proceedings under the  
6 Administrative Procedure Act, suspend for not more than 12 months, or revoke, or  
7 impose probationary conditions upon any license, certificate, or approval issued under  
8 this chapter for unprofessional conduct that includes, but is not limited to, one or any  
9 combination of the following causes:

10                  “ . . . .

11                  “(d)   Conviction of a crime which substantially relates to the qualifications,  
12                               functions, or duties of a physical therapist or physical therapy assistant.  
13                               The record of conviction or a certified copy thereof shall be conclusive  
14                               evidence of that conviction.

15                  “ . . . .

16                  “(f)   Habitual intemperance.

17                  “(g)   Addiction to the excessive use of any habit-forming drug.

18                  “ . . . .

19                  “(l) The commission of any fraudulent, dishonest, or corrupt act which is  
20 substantially related to the qualifications, functions, or duties of a physical therapist or  
21 physical therapy assistant.

22                  “ . . . .”

23                  6.       Section 822 of the Code states:

24                  “If a licensing agency determines that its licentiate’s ability to practice his or her  
25 profession safely is impaired because the licentiate is mentally ill, or physically ill  
26 affecting competency, the licensing agency may take action by any one of the following  
27 methods:

28                  “(a) Revoking the licentiate’s certificate or license.

1           “(b) Suspending the licentiate’s right to practice.

2           “(c) Placing the licentiate on probation.

3           “(d) Taking such other action in relation to the licentiate as the licensing agency  
4 in its discretion deems proper.

5           “The licensing agency shall not reinstate a revoked or suspended certificate or  
6 license until it has received competent evidence of the absence or control of the condition  
7 which caused its action and until it is satisfied that with due regard for the public health  
8 and safety the person’s right to practice his or her profession may be safely reinstated.”

9           7.       Section 136 of the Code provides, in pertinent part:

10          “(a) Each person holding a license . . . issued by [the Physical Therapy Board]  
11 shall notify the issuing board at its principal office of any change in his or her mailing  
12 address within 30 days after the change . . . .

13          “(b) Except as otherwise provided by law, failure to comply . . . constitutes  
14 grounds for the issuance of a citation and administrative fine . . . .”

15          8.       Title 16 California Code of Regulations section 1398.6 provides, in  
16 pertinent part:

17          “(a) Each licensee shall report to the board each and every change of residence  
18 address within 30 days after each change, giving both the old and new address. In  
19 addition to the address of residence, a licensee may provide the board with an alternate  
20 address of record. If an alternate address is the licensee’s address of record, he or she  
21 may request that the residence address not be disclosed to the public.

22          9.       Section 2661.5 of the Code states, in pertinent part:”

23          “(a) In any order issued in resolution of a disciplinary proceeding before the  
24 board, the board may request the administrative law judge to direct any licensee found  
25 guilty of unprofessional conduct to pay to the board a sum not to exceed the actual and  
26 reasonable costs of the investigation and prosecution of the case.”

27       //

28       //

## DRUGS

10. Depakote, a trade name for divalproex sodium, is a dangerous drug as defined in section 4022. Divalproex sodium dissociates to the valproate ion in the gastrointestinal tract. It is used to treat migraine headache, epilepsy, and the manic episodes associated with bipolar disorder. It is contraindicated in patients with compromised liver function, as hepatic failure resulting in fatality has occurred. Its central nervous system (CNS) depressant effects require caution in prescribing in combination with other CNS depressants or in patients who concurrently drink alcohol. The dosage varies depending on the condition it is being used to treat.

11. Vicodin. Vicodin is a trade name for hydrocodone bitartrate w/APAP or acetaminophen. Hydrocodone bitartrate is semisynthetic narcotic analgesic, a dangerous drug as defined in section 4022, and a Schedule III controlled substance and narcotic as defined by section 11056, subdivision (e) of the Health and Safety Code. Repeated administration of hydrocodone over a course of several weeks may result in psychic and physical dependence and tolerance. Therefore, hydrocodone should be prescribed and administered with caution. Patients using other CNS depressants concomitantly with hydrocodone may exhibit an additive CNS depression. When combined therapy is contemplated, the dose of one or both agents should be reduced. Dosage should be adjusted according to the severity of the pain and the response of the patient. However, it should be kept in mind that tolerance to hydrocodone can develop with continued use and that the incidence of untoward effects is dose related. The total 24 hour dose of Vicodin should not exceed eight tablets; the total 24 hour dose of Vicodin ES should not exceed five tablets.

12. Zoloft, a trade name for sertraline hydrochloride, is a selective serotonin reuptake inhibitor (SSRI) chemically unrelated to other SSRIs, tricyclic, tetracyclic, or other available antidepressant agents. It is a dangerous drug as defined by section 4022. Zoloft is used for the treatment of depression, obsessive compulsive disorder, and panic disorder.

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**FACTS**

13. Mr. Delzompo was employed as a physical therapist by Mills-Peninsula Health Services in Burlingame, California from September 3, 1996 through July 7, 2000.

14. On July 9, 1999, Mr. Delzompo's then wife petitioned for dissolution of her marriage to Mr. Delzompo. On August 10, 1999, she obtained a restraining order effective through August 2, 2002 prohibiting Mr. Delzompo from contacting, telephoning, following, or otherwise disturbing her and ordering him to stay at least 100 yards away from her, her home, her place of business, and her car. The marriage was dissolved on October 25, 2000. Mr. Delzompo and his wife were awarded joint legal custody of their daughter and his ex-wife was awarded physical custody with Mr. Delzompo having limited visitation rights only.

15. Between September 23, 1999 and June 8, 2000, Mr. Delzompo was verbally counseled or reprimanded by his employer, Mills-Peninsula, at least three times for, among other things, being abrupt, aggressive, and arrogant when frustrated, swearing in front of patients, and discussing his personal life with patients. Mr. Delzompo was terminated from Mills-Peninsula Health Services effective July 7, 2000.

16. Mr. Delzompo was employed as a physical therapist by Brady Physical Therapy in Foster City, California from January 21, 2001 to May 17, 2001. He was terminated for failure to report back to work after May 17, 2001 without giving explanation or notice.

17. On May 17, 2001, Mr. Delzompo attempted suicide by overdosing on Vicodin and on May 19<sup>th</sup> was involuntarily hospitalized under Welfare and Institutions Code section 5150 at California Pacific Medical Center in San Francisco, California for being a danger to himself. He remained hospitalized through the 25<sup>th</sup>. He was diagnosed with a major depressive episode, likely dysthymia, and alcohol and marijuana abuse, both in remission. Mr. Delzompo reported heavy alcohol and marijuana use until the age of 21 (1989), being clean and sober for about five years, and using marijuana heavily again until August 2000 when he says he stopped. His prognosis upon discharge was "guarded given his long history of dysthymic disorder and the perception that he somewhat clings onto his identity as a depressed person."

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1                   18.     On October 18, 2001, Mr. Delzompo went to his daughter's school and  
2 removed his daughter in violation of the visitation order. He then took his daughter to his ex-  
3 wife's workplace, in violation of the October 10, 1999 restraining order, and, when his ex-wife  
4 picked the girl up, he grabbed her out of her mother's arms and left with her. An Emergency  
5 Protective Order was issued later that day with an expiration date of October 25, 2001 giving  
6 temporary care and control of the daughter to Mr. Delzompo's ex-wife, prohibiting Mr.  
7 Delzompo from contacting, telephoning, following, or otherwise disturbing his ex-wife and  
8 daughter and ordering him to stay at least 100 yards away from his ex-wife and daughter, their  
9 home, and the ex-wife's place of business. The police located Mr. Delzompo and his daughter  
10 that evening. Mr. Delzompo resisted the police who ultimately arrested him, charged him with  
11 abducting his daughter, violating the restraining order, and resisting arrest and placed him in the  
12 county jail.

13                   19.     On October 19, 2001, Mr. Delzompo telephoned his ex-wife from jail, in  
14 violation of both the protective order and the civil restraining order, and left threatening  
15 messages.

16                   20.     When Mr. Delzompo was released from jail, he went to his daughter's  
17 school and approached his ex-wife and daughter on several occasions in violation of the  
18 restraining order and/or the emergency protective order.

19                   21.     On October 22, 2001, Mr. Delzompo went to his daughter's school and  
20 advised the administration that the Emergency Protective Order was invalid.

21                   22.     On October 24, 2001, a criminal complaint was filed against Mr.  
22 Delzompo for the charges made on October 18<sup>th</sup> and he was remanded into custody.

23                   23.     On October 24, 2001, the criminal court issued a stay away order, in effect  
24 until the resolution of the pending criminal case, prohibiting Mr. Delzompo from contacting,  
25 telephoning, harassing, or otherwise disturbing his ex-wife and daughter and ordering him to stay  
26 at least 150 yards away from his ex-wife and daughter, their home, the daughter's childcare and  
27 school, and the ex-wife's place of business.

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1                   24.     On November 2, 2001, Mr. Delzompo pled guilty to violating Penal Code  
2 sections 166(a) (violation of a restraining order) and 148(a) (resisting arrest) and he was given a  
3 suspended sentence and placed on three years court probation.

4                   25.     Mr. Delzompo continued regularly to violate the restraining order even  
5 after his conviction.

6                   26.     On November 20, 2001, a criminal complaint was filed against Mr.  
7 Delzompo charging him with two violations of the restraining order on October 22, 2001.

8                   27.     On November 30, 2001, Mr. Delzompo went to his daughter's school in  
9 violation of the stay away order, waved papers around and saying that he was there to pick up his  
10 daughter, confronted his ex-wife's fiancé who was there to pick up the daughter, swore at and  
11 threatened to kill the fiancé, grabbed his daughter and let her go, grabbed another child and spun  
12 him around "wildly," and ran around in circles yelling. The police came and arrested Mr.  
13 Delzompo for violation of the restraining order.

14                  28.     On December 11, 2001, a temporary restraining order was issued  
15 prohibiting Mr. Delzompo from harassing or approaching his ex-wife's fiancé.

16                  29.     On December 12, 2001, Mr. Delzompo was in an automobile accident  
17 caused when he crossed the double solid yellow lane dividing lines. He suffered injuries  
18 including a compression fracture, lacerated liver, and a possible bladder injury.

19                  30.     On December 26, 2001, the court awarded sole legal and physical custody  
20 of the daughter to Mr. Delzompo's ex-wife and ordered Mr. Delzompo to have no visitation with  
21 his daughter until further order of the court.

22                  31.     On February 12, 2002, Mr. Delzompo again attempted suicide. He drank a  
23 bottle of wine, took Vicodin, tried to put a noose around his neck, and passed out. On February  
24 26, 2002, Mr. Delzompo was involuntarily hospitalized under Welfare and Institutions Code  
25 section 5150 at San Francisco General Hospital Medical Center Department of Psychiatry. He  
26 remained hospitalized through March 13, 2002. He was diagnosed with bipolar disorder NOS  
27 and marijuana abuse. His prognosis upon discharge was "[a]ssuming patient compliance with all  
28 aftercare recommendations at six months, fair; at twelve months, fair." His discharge

1 medications were 750 mg Depakote, 150 mg Zoloft, and cream for a rash.

2           32. In a letter received by the San Mateo County Court on April 26, 2002,  
3 concerning a traffic ticket issued to Mr. Delzompo on September 11, 2001 for running a stop sign  
4 Mr. Delzompo wrote that since a serious automobile accident in December 2001, he had been  
5 homeless, jobless, and diagnosed with major depression and had admitted to a substance abuse  
6 problem. He stated that he was then in a residential program for individuals with mental health  
7 issues. Based on this letter, the court closed the case.

8           33. On May 6, 2002, Mr. Delzompo pled guilty to one count of violating Penal  
9 Code sections 166(a) (violation of a restraining order) and he was given a suspended sentence,  
10 placed on two years court probation, and ordered to serve 20 days in county jail with a  
11 recommendation for the sheriff's work program.

12           34. Mr. Delzompo was employed as a physical therapist, clinic director, and  
13 general managing partner by Physical Therapy Center ("PTC"), Santa Cruz, dba San Luis Sports  
14 Therapy and Orthopedic Rehabilitation in Santa Cruz, California from November 4, 2002  
15 through January 24, 2003.

16           35. Patient SS was treated by Mr. Delzompo at PTC on January 6, 7, 9, 14,  
17 and 16, 2003 for injuries sustained in an automobile accident.

18           36. Mr. Delzompo made inappropriate comments to SS such as "Oh, you're  
19 cute" and referring to his ex-wife as a "lying bitch," asked SS questions about her personal life,  
20 discussed his personal life with SS, and suggested they spend time together outside of the  
21 professional relationship.

22           37. At the beginning of SS's last visit with Mr. Delzompo, he told her that she  
23 was "looking good." Mr. Delzompo then ridiculed SS for complaining about the pain she  
24 experienced while on the exercise bicycle, roughly kneaded her shoulders despite her telling him  
25 that it hurt her, pressed his crotch firmly against her shoulder so that she could feel his penis and  
26 resisted her attempts to pull away, and frightened her with his aggressive behavior toward her.

27           38. After SS had one of her friends call to say that she no longer needed Mr.  
28 Delzompo's services, he telephoned her residence approximately three times; told three of her

1 friends confidential information about her physical therapy treatments and tried to get  
2 information from them about her personal life; and went to her place of employment where he  
3 asked about her and her whereabouts and told her manager that she was not injured.

4           39. On January 8, 2003, Mr. Delzompo was verbally counseled by PTC for  
5 repeated use of profanity in front of patients and employees. He continued to use profanity  
6 following his counseling.

7           40. On January 17, 2003, Mr. Delzompo had one of his patients write the  
8 check for payment for services directly to him instead of PTC and erased the record of the  
9 patient's visit from PTC's files.

10           41. On January 22 and 23, 2003, PTC received telephone calls from three  
11 insurance companies stating that they were going to refuse coverage for treatment provided by  
12 Mr. Delzompo to patients who had complained about his inappropriate behavior because of their  
13 complaints and because his documentation was inadequate.

14           42. On January 24, 2003, patient JB complained to PTC about the treatment  
15 provided to her by Mr. Delzompo. Mr. Delzompo treated JB on January 20 and 22, 2003 for an  
16 injury to the left side of her neck and her upper left back and shoulder.

17           43. Mr. Delzompo discussed his personal life with JB including his previous  
18 drug and alcohol problems, his divorce, and his depression and medications and hinted that he  
19 had begun using marijuana again. Mr. Delzompo never touched her neck or upper back and  
20 shoulder, concentrating instead on her lower back and legs.

21           44. On January 24, 2003, Mr. Delzompo left an unlicensed aide to take care of  
22 the last three patients of the day.

23           45. Mr. Delzompo was terminated from PTC effective January 24, 2003.

24           46. On February 2, 2003, Mr. Delzompo was arrested in Soquel, California for  
25 possession of marijuana. He had been smoking marijuana in a bar in Soquel.

26           47. Mr. Delzompo was employed as a physical therapist by Doctors on duty in  
27 Aptos, California on March 24, 2003.

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1                   48.     On March 27, 2003, Mr. Delzompo was stopped in Santa Cruz, California  
2 by the California Highway Patrol and, after failing the field sobriety tests, arrested for driving  
3 under the influence of alcohol. His blood alcohol level was 0.1 percent.

4                   49.     On April 3, 2003, Mr. Delzompo pled guilty to violating Penal Code  
5 section 11357 (possession of marijuana) and ordered to pay a fine of \$102 and \$100 restitution.

6                   50.     Mr. Delzompo was terminated by Doctors on Duty for failure to report to  
7 work after April 9, 2003.

8                   51.     On April 10, 2003, Mr. Delzompo broke down at an AA meeting and told  
9 friends at the meeting that he had been contemplating suicide by hanging himself or walking into  
10 traffic. His friends brought him to Dominican Hospital CHW, Behavioral Health Services,  
11 Department of Psychiatry where he was involuntarily hospitalized under Welfare and Institutions  
12 Code section 5150. He remained hospitalized through April 18, 2003. Mr. Delzompo reported a  
13 long history of depression and alcohol and marijuana abuse including a recent history of periods  
14 of sobriety alternating with alcohol and marijuana use. He was diagnosed with depressive  
15 disorder, NOS, rule out bipolar disorder, and polysubstance abuse, marijuana and alcohol. His  
16 discharge medications were 1250 mg Depakote and 50 mg Zoloft.

17                   52.     On April 14, 2003, a complaint was filed charging Mr. Delzompo with  
18 violating Vehicle Code sections 23152(a) and 23152(b) (driving under the influence of alcohol  
19 and driving with a blood alcohol level of 0.08 percent or higher) and 16028(a) (driving without  
20 insurance) on March 27, 2003.

21                   53.     On April 14, 2003, the California Board of Physical Therapy sent a letter  
22 addressed to Mr. Delzompo at 18 Greenview Court, San Francisco, California 94131, his address  
23 of record. The letter was returned by the United States Postal Service with the notation "moved,  
24 left no address." Mr. Delzompo later advised the board that he had left that address in mid- to  
25 late-2002 and had not notified the board of his change of address.

26                   54.     On April 29, 2003, the San Mateo County Department of Child Support  
27 Services filed an Abstract of Support Judgment against Mr. Delzompo with the San Mateo  
28 County Superior Court. The Abstract of Support Judgment was recorded on May 9, 2003.

1                   55.     The Department of Motor Vehicles administratively suspended Mr.  
2 Delzompo's driver's license, effective August 2, 2003, for driving with a blood alcohol content  
3 of 0.08 percent or above on March 27, 2003. The administrative suspension was to remain in  
4 effect through December 1, 2003.

5                   56.     On September 10, 2003, the board sent an Address Information Request to  
6 the Postmaster at the USPS Burke Station asking for Mr. Delzompo's address. On September  
7 15, 2003, the board received notification from the post office that Mr. Delzompo had "moved,  
8 left no forwarding address."

9                   57.     On January 30, 2004, the Santa Cruz County District Attorney filed a  
10 criminal complaint against Mr. Delzompo charging him with violating Penal Code section  
11 476a(a) (non-sufficient funds) for writing a check for \$29.80 to Deluxe Foods and a check for  
12 \$50.92 to Quality Foods without sufficient funds to cover them.

13                  58.     From March 3, 2004 until May 2004, Mr. Delzompo was in treatment at  
14 Santa Cruz Residential Recovery (formerly Sunflower House). This is a two month residential  
15 treatment facility offering education in denial management and relapse prevention.

16                  59.     On March 25, 2004, an investigator with the Department of Consumer  
17 Affairs' Division of Investigations interviewed Mr. Delzompo on behalf of the board. Mr.  
18 Delzompo confirmed that he had a substance abuse problem, that alcohol and marijuana were his  
19 drugs of choice, and that he had struggled with active addiction and alcoholism most of his life.  
20 He said that he had been sober for approximately a month or more. Mr. Delzompo said that he  
21 did not remember whether he had ever treated patients while under the influence of alcohol or  
22 marijuana but that he might have. He admitted that he had fallen asleep on a few occasions while  
23 on work time with PTC because he was "stoned."

24                  60.     On April 5, 2004, the Department of Consumer Affairs sent Mr.  
25 Delzompo a Suspension Notice notifying him that his Physical Therapy license had been  
26 suspended pursuant to Family Code section 17520 and that the suspension would remain in effect  
27 until the department received a valid release form from the District Attorney certifying that he  
28 was in compliance with the judgment of child support.

61. On April 29, 2004, Mr. Delzompo pled nolo contendere to driving with a blood alcohol level of 0.08 percent or higher on March 27, 2003 (Vehicle Code section 23152(b)). The two other counts were dismissed and Mr. Delzompo was sentenced to serve three days in jail and pay a fine and placed on five years of informal court probation with conditions including total abstention from the use of alcohol.

62. On April 29, 2004, a pretrial conference was held before the Santa Cruz County Superior Court on the January 30, 2004 criminal complaint for non-sufficient funds. Time was waived to October 29, 2004 to allow Mr. Delzompo an opportunity to make restitution. The docket reflects that the case will be dismissed if restitution is made.

**FIRST CAUSE FOR DISCIPLINE**

(Conviction)

63. Respondent's physical therapist's license is subject to disciplinary action under Business and Professions Code section 2660(d) (conviction) in that he was convicted twice for violating Penal Code section 166(a) (violation of a restraining order), once for violating Penal Code section 148(a) (resisting arrest), once for violating Vehicle Code section 23152(b) (driving with a blood alcohol level of 0.08 percent or higher), and once for violating Penal Code section 11357 (possession of marijuana), offenses substantially related to the qualifications, functions, or duties of a physical therapist.

## **SECOND CAUSE FOR DISCIPLINE**

(Fraudulent, Dishonest or Corrupt Act)

64. Respondent's physical therapist's license is subject to disciplinary action under Business and Professions Code section 2660(l) (fraudulent, dishonest or corrupt act) in that he directed one of his patients at PTC to write a check for payment for services directly to him instead of PTC and erased the record of the patient's visit from PTC's files, a dishonest and corrupt act substantially related to the qualifications, functions, or duties of a physical therapist.

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1 **THIRD CAUSE FOR DISCIPLINE**

2 (Habitual Intemperance, Addiction)

3 65. Respondent's physical therapist's license is subject to disciplinary action  
4 under Business and Professions Code section 2660, subsections (f) (habitual intemperance) and  
5 (g) (addiction to the excessive use of any habit-forming drug) in that he is addicted to alcohol and  
6 marijuana, has struggled with active addiction and alcoholism most of his life, admits that he  
7 may have treated patients while under the influence of alcohol or marijuana, admits that he has  
8 been "stoned" while on the job as a physical therapist, and has been convicted of crimes  
9 involving the abuse of alcohol and marijuana.

10 **FOURTH CAUSE FOR DISCIPLINE**

11 (Unprofessional Conduct)

12 66. Respondent's certificate to practice physical therapy is subject to  
13 disciplinary action under Business and Professions Code section 2660 (unprofessional conduct)  
14 in that, among other things, he swore in front of patients; discussed his personal life with patients  
15 including his drug and alcohol problems, his divorce, his depression, and his medications; tried  
16 to establish a personal relationship outside of the therapeutic relationship with a patient; pursued  
17 a patient through her friends and employer; and inappropriately discussed a patient's treatment  
18 with her friends and employer.

19 **FIFTH CAUSE FOR DISCIPLINE**

20 (Unprofessional Conduct, Failure to Report Change of Address)

21 67. Respondent's certificate to practice physical therapy is subject to  
22 disciplinary action under Business and Professions Code sections 2660 (unprofessional conduct)  
23 and 136(a) (failure to report change of address) and Title 16 California Code of Regulations  
24 section 1398.6 (failure to report change of address) in that he failed to report a change of his  
25 main address to the board.

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1 **SIXTH CAUSE FOR ACTION**

2 (Mental Illness)

3 68. Respondent is subject to action against his license pursuant to section  
4 822 in that his ability to practice his profession safely is impaired because he is mentally ill and  
5 his illness affects his competency.

6 **PRAYER**

7 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
8 alleged, and that following the hearing, the Physical Therapy Board of California issue a  
9 decision:

10 1. Revoking or suspending License Number PT 21739, issued to Anthony  
11 Michael Delzompo, P.T.;

12 2. Ordering Anthony Michael Delzompo, P.T. to pay the Physical Therapy  
13 Board of California the reasonable costs of the investigation and enforcement of this case,  
14 pursuant to Business and Professions Code section 2661.5; and

15 3. Taking such other and further action as deemed necessary and proper.

16 DATE: 05/28/2004

17  
18 Original Signed By:  
19 STEVEN K. HARTZELL  
20 Executive Officer  
21 Physical Therapy Board of California  
22 Department of Consumer Affairs  
23 State of California  
24 Complainant  
25  
26  
27  
28